

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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SCOTT TURNAGE, CORTEZ D. BROWN,  
DEONTAE TATE, JEREMY S. MELTON, ISSACCA  
POWELL, KEITH BURGESS, TRAVIS BOYD,  
TERRENCE DRAIN and KIMBERLY ALLEN  
on behalf of themselves and all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity as former  
Sheriff of Shelby County, Tennessee; FLOYD BONNER,  
JR., in his official capacity as Sheriff of Shelby County,  
Tennessee; ROBERT MOORE, in his individual capacity  
as former Jail Director of Shelby County, Tennessee;  
KIRK FIELDS, in his official capacity as the Jail Director  
of Shelby County, Tennessee; CHARLENE MCGHEE, in  
her individual capacity as former Assistant Chief of Jail  
Security of Shelby County, Tennessee; REGINALD  
HUBBARD, in his official capacity as Assistant Chief of  
Jail Security of Shelby County, Tennessee; DEBRA  
HAMMONS, in her individual capacity as former Assistant  
Chief of Jail Programs; TIFFANY WARD in her official  
capacity as the Assistant Chief of Jail Programs of Shelby  
County, Tennessee; SHELBY COUNTY, TENNESSEE,  
a Tennessee municipality; TYLER TECHNOLOGIES,  
INC., a foreign corporation; GLOBAL TEL\*LINK  
CORPORATION, a foreign corporation; SOFTWARE  
AG USA, INC., a foreign corporation; SIERRA-CEDAR,  
INC., a foreign corporation; SIERRA SYSTEMS GROUP,  
INC., a foreign corporation, and TETRUS CORP, a foreign  
Corporation,

Defendants.

Civil Action No. 2:16-cv-02907-  
SHM-tmp

Jury Demanded

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**NOTICE OF FILING OF CORRECTED EXHIBIT 1 TO RESPONSE  
IN OPPOSITION TO PLAINTIFFS' MOTION**

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Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee (collectively referred to as the “Shelby County Defendants”) respectfully give notice of filing a corrected Declaration of Odell Horton, Jr., previously submitted as Exhibit 1 to Shelby County Defendants’ Response in Opposition to Plaintiffs’ Motion for a Discovery Conference, to Permit Merits-Based Discovery, to Compel Depositions, and for Sanctions (ECF No. 313). Due to technical difficulties experienced in the course of filing, the Declaration of Odell Horton, Jr. was filed without its attached exhibits. The Shelby County Defendants now submit to the Court a corrected version of the Declaration of Odell Horton, Jr. containing all exhibits, attached hereto as Exhibit 1.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 10, 2020, a true and correct copy of the foregoing was served upon the following counsel via the Court's ECF filing system:

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